

June 18, 2018

Ms. Barcy F. McNeal, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3797

Re: Third Supplement to Application – PJM System Impact Study

Case No. 17-774-EL-BGN

In the Matter of the Application of Vinton Solar Energy LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Vinton County, Ohio.

Dear Ms. McNeal:

On July 6, 2017, as supplemented on August 16, 2017 and February 28, 2018, Vinton Solar Energy LLC (“Applicant”) filed an application with the Ohio Power Siting Board (“Board”) for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Vinton County, Ohio (“Application”).

On November 16, 2017, the Applicant filed a motion to toll the procedural time line, pending the Applicant’s receipt and filing of the System Impact Study (“SIS”) from PJM Interconnection LLC (“PJM”). Because the Board had already established the effective date of the Application and in light of the limited scope of the information to be provided by the SIS, the Applicant requested that the procedural time line be tolled. Specifically, the Applicant requested that, once the SIS was filed, the Board issue an entry establishing the procedural schedule, which would provide that: the Staff Report would be filed at least 15 days before the commencement of the public hearing; and the public hearing in Vinton County would be scheduled to commence within 30 days after the filing of the SIS. In addition, the Applicant committed to serve and publish an initial notice of the hearings within 7 days of the entry, and serve and publish a second notice of the hearings at least 7 but no more than 14 days before commencement of the public hearing.

On November 17, 2017, the Administrative Law Judge granted the Applicant’s November 16, 2017 motion to toll the procedural schedule, stating that the dates for the hearings would be reestablished by subsequent entry after the SIS is filed.

At this time, the Applicant is filing this Third Supplement to the Application, in order to provide the Board with the SIS from PJM, which is dated June 2018.

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The original of this Third Supplement to the Application has been filed electronically. In addition, 20 complete paper copies containing the supplemental information to the Application have been provided.

We are available, at your convenience, to answer any questions you may have.

Respectfully submitted,

/s/ Christine M.T. Pirik
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Enclosure

Cc: Jon Pawley

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CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the person below via electronic mail this 18th day of June, 2018.

/s/ Christine M.T. Pirik
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COLUMBUS 39579-29 91849v3

***Generation Interconnection
System Impact Study Report***

For

***PJM Generation Interconnection Request
Queue Position AC1-194***

Elk 138 kV

June 2018

Preface

The intent of the System Impact Study is to determine a plan, with approximate cost and construction time estimates, to connect the subject generation interconnection project to the PJM network at a location specified by the Interconnection Customer. As a requirement for interconnection, the Interconnection Customer may be responsible for the cost of constructing: (1) Direct Connections, which are new facilities and/or facilities upgrades needed to connect the generator to the PJM network, and (2) Network Upgrades, which are facility additions, or upgrades to existing facilities, that are needed to maintain the reliability of the PJM system. All facilities required for interconnection of a generation interconnection project must be designed to meet the technical specifications (on PJM web site) for the appropriate transmission owner.

In some instances a generator interconnection may not be responsible for 100% of the identified network upgrade cost because other transmission network uses, e.g. another generation interconnection or merchant transmission upgrade, may also contribute to the need for the same network reinforcement. The possibility of sharing the reinforcement costs with other projects may be identified in the feasibility study, but the actual allocation will be deferred until the System Impact Study is performed.

The System Impact Study estimates do not include the feasibility, cost, or time required to obtain property rights and permits for construction of the required facilities. The project developer is responsible for the right of way, real estate, and construction permit issues. For properties currently owned by Transmission Owners, the costs may be included in the study.

General

Invenergy Solar Development, LLC (Invenergy) proposes to install PJM Project #AC1-194, a 125.0 MW (47.5 MW Capacity) solar generating facility in Vinton County, Ohio (see Figure 2). The point of interconnection will be a direct connection to AEP's Elk 138 kV substation (see Figure 1).

The requested in service date is December 31, 2018.

Attachment Facilities

Point of Interconnection (Elk 138 kV Substation)

To accommodate the interconnection at the Elk 138 kV substation, the substation will have to be expanded requiring the installation of three (3) 138 kV circuit breakers, installing two 138 kV buses, and physically configuring the substation in a breaker and half bus arrangement (see Figure 1). Installation of associated protection and control equipment, 138 kV line risers, SCADA, and 138 kV revenue metering will also be required. AEP reserves the right to specify the final acceptable configuration considering design practices, future expansion, and compliance requirements.

Direct Connection at the Elk 138 kV Substation Work and Cost:

- Expand the Elk 138 kV substation, install two 138 kV buses and install three (3) 138 kV circuit breakers (see Figure 1). Installation of associated protection and control equipment, 138 kV line risers, SCADA, and 138 kV revenue metering will also be required.
- **Estimated Station Cost: \$5,000,000**

Direct Connection Cost Estimate

The total preliminary cost estimate for Direct Connection work is given in the following tables below.

For AEP building Direct Connection cost estimates:

Description	Total Cost
Elk-Poston 138 kV circuit Cut Into Elk	\$500,000
Total	\$500,000

Non-Direct Connection Cost Estimate

The total preliminary cost estimate for Non-Direct Connection work is given in the following tables below:

For AEP building Direct Connection cost estimates:

Description	Estimated Cost
138 kV Revenue Metering	\$250,000
Upgrade line protection and controls at the Poston 138 kV substation to coordinate with the expanded Elk 138 kV substation.	\$250,000
Upgrade line protection and controls at the Corwin 138 kV substation to coordinate with the expanded Elk 138 kV substation.	\$250,000
Total	\$750,000

Table 1

Interconnection Customer Requirements

It is understood that Invenergy is responsible for all costs associated with this interconnection. The costs above are reimbursable to AEP. The cost of Invenergy's generating plant and the costs for the line connecting the generating plant to Invenergy's switching station are not included in this report; these are assumed to be Invenergy's responsibility.

The Generation Interconnection Agreement does not in or by itself establish a requirement for American Electric Power to provide power for consumption at the developer's facilities. A separate agreement may be reached with the local utility that provides service in the area to ensure that infrastructure is in place to meet this demand and proper metering equipment is installed. It is the responsibility of the developer to contact the local service provider to determine if a local service agreement is required.

Requirement from the PJM Open Access Transmission Tariff:

1. An Interconnection Customer entering the New Services Queue on or after October 1, 2012 with a proposed new Customer Facility that has a Maximum Facility Output equal to or greater than 100 MW shall install and maintain, at its expense, phasor measurement units (PMUs). See Section 8.5.3 of Appendix 2 to the Interconnection Service Agreement as well as section 4.3 of PJM Manual 14D for additional information.
2. The Interconnection Customer may be required to install and/or pay for metering as necessary to properly track real time output of the facility as well as installing metering which shall be used for billing purposes. See Section 8 of Appendix 2 to the Interconnection Service Agreement as well as Section 4 of PJM Manual 14D for additional information.

Revenue Metering and SCADA Requirements

PJM Requirements

The Interconnection Customer will be required to install equipment necessary to provide Revenue Metering (KWH, KVARH) and real time data (KW, KVAR) for IC's generating Resource. See PJM Manuals M-01 and M-14D, and PJM Tariff Sections 24.1 and 24.2.

AEP Requirements

The Interconnection Customer will be required to comply with all AEP Revenue Metering Requirements for Generation Interconnection Customers. The Revenue Metering Requirements may be found within the “Requirements for Connection of New Facilities or Changes to Existing Facilities Connected to the AEP Transmission System” document located at the following link:

<http://www.pjm.com/~media/planning/plan-standards/private-aep/aep-interconnection-requirements.ashx>

Network Impacts

The Queue Project AC1-194 was evaluated as a 125.0 MW (Capacity 47.5 MW) injection into the Elk 138 kV substation in the AEP area. Project AC1-194 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AC1-194 was studied with a commercial probability of 100%. Potential network impacts were as follows:

Base Case Used

Summer Peak Analysis – 2020 Case

Contingency Descriptions

The following contingencies resulted in overloads:

None

Generator Deliverability

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

None

Multiple Facility Contingency

(Double Circuit Tower Line, Fault with a Stuck Breaker, and Bus Fault contingencies for the full energy output)

None

Contribution to Previously Identified Overloads

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

None

Steady-State Voltage Requirements

None

Short Circuit

(Summary of impacted circuit breakers)

New circuit breakers found to be over-duty:

None

Stability Analysis

No mitigations found to be required

Affected System Analysis & Mitigation

LGEE Impacts:

None

MISO Impacts:

None

Duke, Progress & TVA Impacts:

None

OVEC Impacts:

None

Delivery of Energy Portion of Interconnection Request

PJM also studied the delivery of the energy portion of this interconnection request. Any problems identified below are likely to result in operational restrictions to the project under study. The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed below. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.

None

New System Reinforcements

(Upgrades required to mitigate reliability criteria violations, i.e. Network Impacts, initially caused by the addition of this project generation)

None

Contribution to Previously Identified System Reinforcements

(Overloads initially caused by prior Queue positions with additional contribution to overloading by this project. This project may have a % allocation cost responsibility which will be calculated and reported for the Impact Study)

(Summary form of Cost allocation for transmission lines and transformers will be inserted here if any)

None

Schedule

It is anticipated that the time between receipt of executed agreements and Commercial Operation may range from 12 to 18 months if no line work is required. If line work is required, construction time would be between 24 to 36 months after signing an interconnection agreement.

Note: The time provided between anticipated normal completion of System Impact, Facilities Studies, subsequent execution of ISA and ICSA documents, and the proposed In-Service Date is shorter than usual and may be difficult to achieve.

Conclusion

Based upon the results of this System Impact Study, the construction of the 125.0 MW (47.5 MW Capacity) solar generating facility of Invenergy (PJM Project #AC1-194) will require the following additional interconnection charges. This plan of service will interconnect the proposed solar generating facility in a manner that will provide operational reliability and flexibility to both the AEP system and the Invenergy generating facility.

Cost Breakdown for Point of Interconnection			
Type of Network Upgrade	Network Upgrade Number	Description	Estimated Cost
Non-Direct Connection Cost Estimate	n5674	Expand the Elk 138 kV Substation	\$5,000,000
	n5675	Elk-Poston 138 kV circuit Cut Into Elk	\$500,000
	n5676	138 kV Revenue Metering	\$250,000
	n5677	Upgrade line protection and controls at the Poston 138 kV substation to coordinate with the expanded Elk 138 kV substation.	\$250,000
	n5678	Upgrade line protection and controls at the Corwin 138 kV substation to coordinate with the expanded Elk 138 kV substation.	\$250,000
		Total Estimated Cost for Project AC1-188	\$6,250,000

Table 3

The estimates are preliminary in nature, as they were determined without the benefit of detailed engineering studies. Final estimates will require an on-site review and coordination to determine final construction requirements.

Figure 1: Point of Interconnection (Elk 138 kV Substation)
Single-Line Diagram

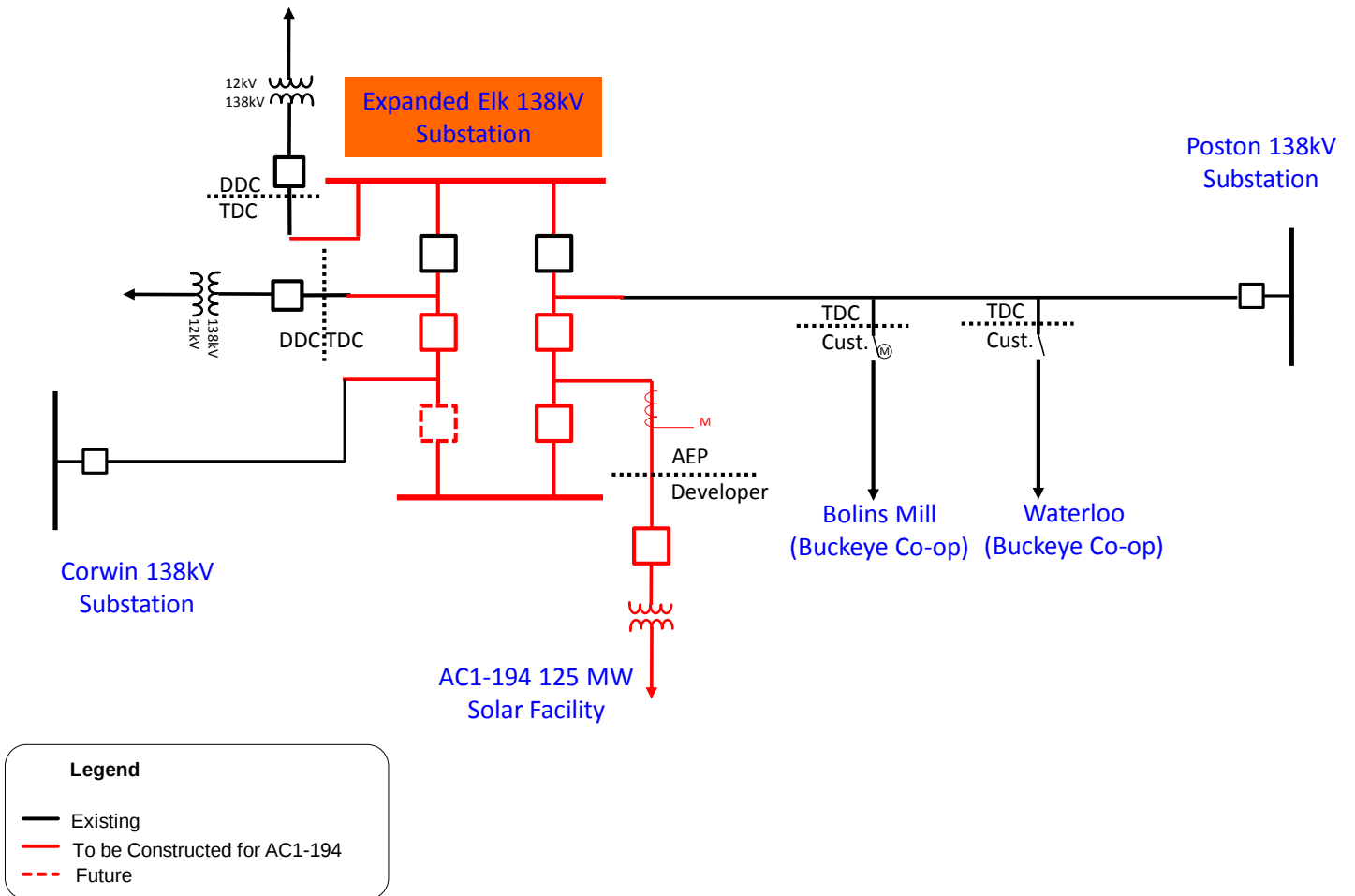
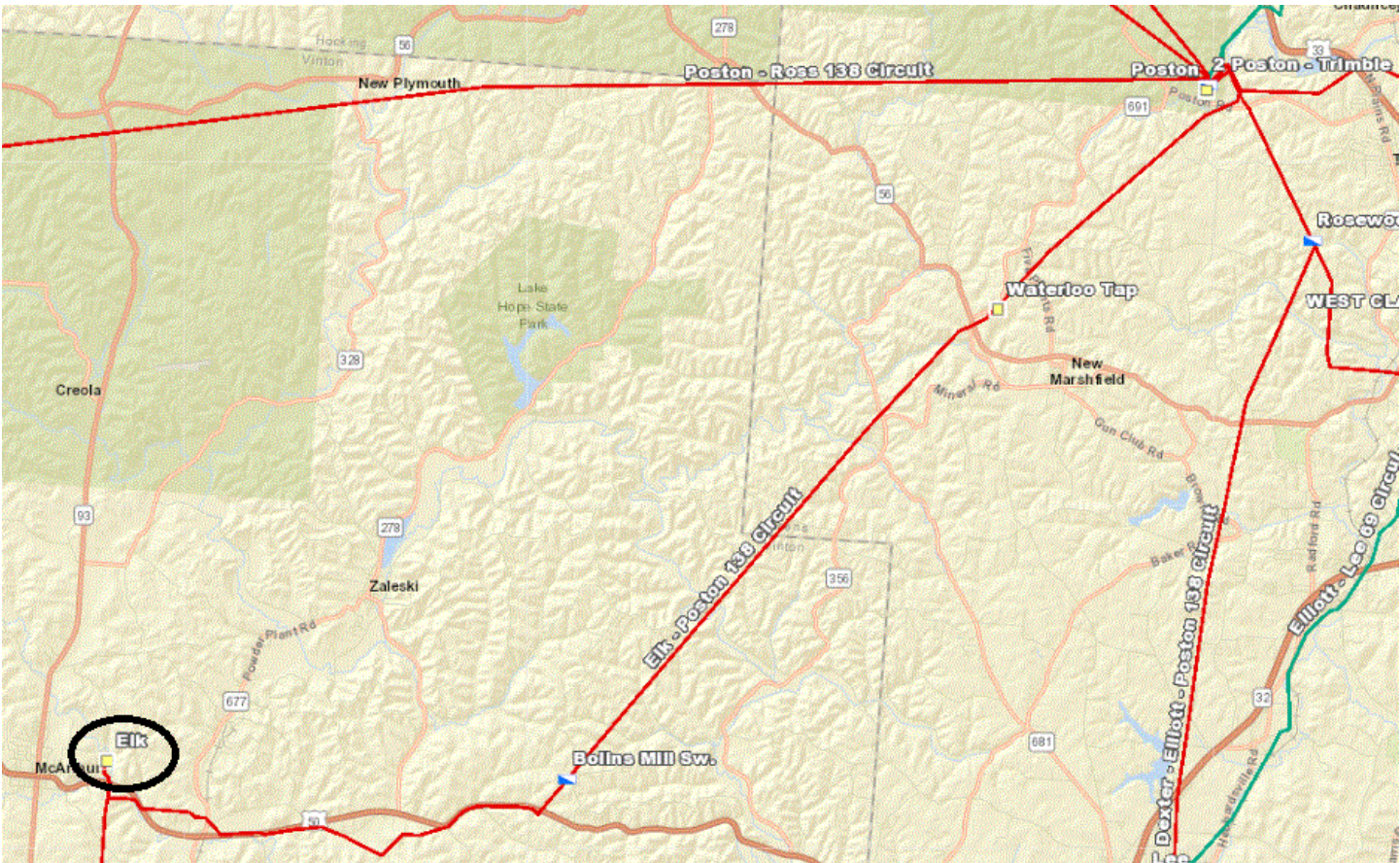


Figure 2: Point of Interconnection (Elk 138 kV Substation)



This foregoing document was electronically filed with the Public Utilities

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Case No(s). 17-0774-EL-BGN

Summary: Amended Application Third Supplement to Application – PJM System Impact Study
electronically filed by Christine M.T. Pirik on behalf of Vinton Solar Energy LLC